

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Deidre Ruth Carter-Jones

Debtor

**Wells Fargo Bank, N. A. as Trustee for the
Carrington Mortgage Loan Trust, Series 2007-FRE1,
Asset-Backed Pass-Through Certificates**

Movant

vs.

**Deidre Ruth Carter-Jones
Kenneth E. West, Trustee**

Respondents

BK NO. 24-11307 AMC

Chapter 13

Hearing Date: 08/20/24

**OBJECTION OF WELLS FARGO BANK, N. A. AS TRUSTEE FOR THE
CARRINGTON MORTGAGE LOAN TRUST, SERIES 2007-FRE1, ASSET-BACKED
PASS-THROUGH CERTIFICATES TO CONFIRMATION OF CHAPTER 13 PLAN**

Wells Fargo Bank, N. A. as Trustee for the Carrington Mortgage Loan Trust, Series 2007-FRE1, Asset-Backed Pass-Through Certificates (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 Plan and asserts in support of its Objection as follows:

1. The claims bar date is June 26, 2024. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$291,868.77.
2. Debtor's Plan provides for payment in the amount of \$137,697.82 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$154,170.95 and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Wells Fargo Bank, N. A. as Trustee for the Carrington Mortgage Loan Trust, Series 2007-FRE1, Asset-Backed Pass-Through Certificates, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: June 14, 2024

By: /s/ Denise Carlon

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